



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

FILED

07-11-06

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Application of California-American Water Company (U-210-W) (1) to issue, sell and deliver to one or more affiliated entities not exceeding in the aggregate \$187,000,000 of any combination of (a) shares of its common stock and (b) debt securities consisting of long term notes; and (2) exempting the issuance, sale and delivery of such stock and debt securities from the Commission's competitive bidding rule.

A. 06-05-005

**COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES
ON OPINION AUTHORIZING THE ISSUANCE OF DEBT AND
COMMON STOCK**

Pursuant to Rule 77.2 of the Commission's Rules of Practice and Procedure and the parties' agreed to shortened comment period of five business days, the Division of Ratepayer Advocates ("DRA") hereby submits its comments on Administrative Law Judge Galvin's draft decision.

DRA has reviewed the draft decision and is in agreement with the draft decision's conclusions and findings.

Respectfully submitted,

/s/ SELINA SHEK

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July 11, 2006

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of “**THE COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES ON OPINION AUTHORIZING THE ISSUANCE OF DEBT AND COMMON STOCK**” in **A.06-05-005** by using the following service:

[**X**] **E-Mail Service:** sending the entire document as an attachment to all known parties of record who provided electronic mail addresses.

[] **U.S. Mail Service:** mailing by first-class mail with postage prepaid to all known parties of record who did not provide electronic mail addresses.

Executed on July 11, 2006 at San Francisco, California.

/s/ ANGELITA MARINDA
Angelita Marinda

N O T I C E

Parties should notify the Process Office, Public Utilities Commission, 505 Van Ness Avenue, Room 2000, San Francisco, CA 94102, of any change of address and/or e-mail address to insure that they continue to receive documents. You must indicate the proceeding number on the service list on which your name appears.

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